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April 22, 2019

**BY ECF**

Honorable Paul G. Gardephe  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Upon Jochola, et al v. Green Summit Group LLC, et al.  
18-cv-1360

Cruz Sanchez, et al v. Rainbow Umbrella, LLC, et al.  
17-cv-9065

Your Honor:

This office represents Plaintiffs in the above- referenced matters. We write to request a 30 day extension to file Plaintiffs' motion for settlement to May 22, 2019. The reason for the request is because the undersigned received the agreement a few days ago and because of other pressing matters, additional time is required to review and negotiate the terms and have all the client come in to review and sign the agreement. Thus, we respectfully request a deadline of May 22, 2019 to submit Plaintiffs' motion for settlement. We thank the Court for its time and attention to this matter. Defendants consent to the extension.

Respectfully Submitted,

/s/ Gennadiy Naydenskiy  
Gennadiy Naydenskiy

cc: Jason Klimpl, Esq. (via ECF)  
Vincent Miranda, Esq. (via ECF)